



**The Commonwealth of Massachusetts**

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**DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY**

September 5, 2006

**BAY STATE GAS COMPANY**  
D.T.E. 06-31

**THIRD SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY TO  
BAY STATE GAS COMPANY**

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Bay State Gas Company ("Bay State" or "Company") the following Information Requests. Answers are due September 12, 2006. In addition to filing, all non-proprietary responses should be submitted by e-mail to A. John Sullivan (five copies), Paul E. Osborne, Caroline M. Bulger, [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us), and to the e-mail address of any party required to be served.

**INFORMATION REQUESTS**

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|-------------|---|
| DTE-BSG-3-1 | Refer to the Company's response to UWUA 2-2(A), Cause No. 42194 at 14. Please provide, to the extent the Company relies on an Area Service Model business structure, a copy of the Area Service Model currently in use by the Company.  |
| DTE-BSG-3-2 | Refer to the Company's response to UWUA 2-2(A), Cause No. 42194 at 1. Please provide (1) maps of the Company's Local Operating Areas ("LOAs"), (2) the number of service persons for each LOA, and (3) the number of years each service person has been working in their current LOA.                                   |
| DTE-BSG-3-3 | Refer to the Company's response to UWUA 2-2(A). Please provide a copy of the most recent union contract that NiSource entered into with USW Local 13796.  |
| DTE-BSG-3-4 | Refer to the Company's response to BSG 1-12. Please provide detailed information concerning the Company's Workforce Management System, including examples of the information fed into the system on a daily, monthly and yearly basis. Also describe how this system ensures that correct staffing levels are achieved. |

- DTE-BSG-3-5 Refer to the Company's response to Exh. BSG 1-12. Please provide complete details describing the Company's Logistic Group, including (1) the number and title/function of all employees included in this group, (2) how they communicate between the different departments such as Billing Exceptions, the Contact Center and Metering and Service, and (3) the goals and policies of the group.
- DTE-BSG-3-6 Refer to the Company's response to BSG 1-12. Please provide a copy of the schedule board which matches available manpower to workload, and fully describe how the schedule board functions.
- DTE-BSG-3-7 Refer to the Company's response to DTE-BSG-1-13. Please provide, in the same format as the referenced exhibit, the Company's staffing levels at the Brockton, Springfield, Lawrence and Westboro locations as of June 30 of each year from 1997 through 2005.
- DTE-BSG-3-8 Refer to the Company's response to Exh. BSG 1-13. Please provide, to the extent such information is available, any future projections of staffing using the format of this chart, applying the Company's current business model.
- DTE-BSG-3-9 Refer to Exh. BSG 1-14. Please provide the following information concerning those Bay State positions that were eliminated due to the merger with Columbia Gas Systems:
1. Exact number of positions eliminated;
  2. The titles of the eliminated positions;
  3. A description of the duties associated with each position; and
  4. The reasoning behind the elimination of each position.
- DTE-BSG-3-10 Please provide all studies, analyses, reports etc. pertaining to sales and sales projections for the Company (prepared by either Bay State or by NiSource on behalf of Bay State) during the years 1997 through 2006.
- DTE-BSG-3-11 Please provide all studies, analyses, reports etc. pertaining to sales development and sales staffing for the Company (prepared by either Bay State or by NiSource on behalf of Bay State) during the years 1997 through 2006.
- DTE-BSG-3-12 Please provide all documents, including, but not limited, to internal memoranda, reports, and analyses which relate to sales performance of the Company's sales division as a whole over the years 1997 through 2006.

- DTE-BSG-3-13 Please discuss in detail the Company's experience with quantifying the relationship in sales dollars with leads generated from the Company's advertizing expense for natural gas conversion, builder/developer gas installation, rebates, and incentives.
- DTE-BSG-3-14 Please discuss in detail the Company's experience with quantifying the relationship between reductions in sales staff and both quality of service and sales volume. To facilitate a response to this question, if the Company has information regarding the experience of other NiSource subsidiaries with the relationship between sales staff and both quality of service and sales volume, the Company may reference those experiences.
- DTE-BSG-3-15 Refer to Exh. BSG-1, at 24. Please discuss the evidence that the Company is referring to regarding its position that recent sales growth declines resulted from changes in the residential oil-to-gas conversion market.
- DTE-BSG-3-16 Refer to the Company's response to UWUA 1-2, Attachment A at 1. Please explain the term "IRVU" as used in the context of this satisfaction survey.
- DTE-BSG-3-17 Refer to the Company's response to UWUA 1-2, Attachment A at 1. Please explain the reason for the decline in customer satisfaction with IVRU transactions indicated in this satisfaction survey.
- DTE-BSG-3-18 Refer to the Company's response to UWUA 1-2 at Attachment A at 1. Please explain the reason for the overall customer satisfaction with time spent to complete IVRU transactions indicated in this satisfaction survey.
- DTE-BSG-3-19 Refer to the Company's response to UWUA 2-1. Please provide additional details concerning the 12 "regulatory personnel" being transferred from NiSource to Bay State. Please list the exact titles of the positions transferred and the job responsibilities associated with each position.
- DTE-BSG-3-20 Refer to RR-9 (Confidential) at Exhibit 2, at 872 in Bay State Gas Company, D.T.E. 05-27 (2005). Has the alternative sales center described herein been opened? As part of this response, describe the relationship between this NiSource sales center and the current Bay State sales office in New Hampshire.

- DTE-BSG-3-21 Refer to the Company's response to DTE BSG-1-10 c (Supp.) at 3. Please provide the date that Mr. Cote was promoted to General Manager of NiSource East.
- DTE-BSG-3-22 Refer to the Company's response to DTE BSG-1-10 c (Supp.) at 3. Please explain whether Mr. Bryant reports to Mr. Cote in Mr. Cote's capacity as General Manager of NiSource East.
- DTE-BSG-3-23 Refer to the Company's response to DTE BSG-1-10 c (Supp.) at 11. Please explain whether there were there any organizational events or problems that led to the issuance of an employee survey. Have the results of the survey been complied? If so, provide a copy of the survey results, as well as any papers, memos or presentations made to management associated with this survey. If possible, also provide a breakdown of results for Bay State staff only.
- DTE-BSG-3-24 Refer to the Company's response to DTE BSG-1-10 c (Supp.) At 1. Please explain whether the four key elements of NiSource's Business plan described herein are still currently in place for the Company.
- DTE-BSG-3-25 Refer to the Company's response to DTE BSG-1-10 c (Supp.) at 46, 82. Please explain how the Company intends to expand in New England if its sales office and organization are based in Pennsylvania?
- DTE-BSG-3-26 Refer to the Company's response to DTE BSG-1-10 c (Supp.) At 128. Please identify and describe the Company's experience, positive or negative, associated with the move of the Kentucky and Ohio Customer Call Centers to Pennsylvania.
- DTE-BSG-3-27 Refer to the Company's response to DTE BSG-1-10 c (Supp.) At 128. Please explain why the Indiana Customer Call Center in Indiana is not being consolidated in Pennsylvania.
- DTE-BSG-3-28 Refer to the Company's response to information request USW 2-1. Please provide a table in the same format as provided therein showing staffing levels at Bay State from December 31, 1997 through November 30, 2005. For purposes of this response the column labeled, "Changes - Net Effect" is not required.
- DTE-BSG-3-29 Please provide all collective bargaining agreements that were in effect from November 25, 1997 to the present.